

DISCLOSURE OF MALPRACTICE IN THE WORKPLACE (“WHISTLEBLOWING”) POLICY

Purpose

It is vital that everyone who works for LIA International CIO maintains the highest standards of conduct, integrity and ethics, and complies with all relevant legislation. If a member of staff has genuine concerns about malpractice in the workplace, we wish to encourage him/her to communicate these without fear of reprisals and in the knowledge that he/she will be **protected from victimisation and dismissal**.

Malpractice

Malpractice includes (but is not limited to)

- financial wrongdoing including theft, bribery, fraud, money laundering or diversion of donations
- failure to comply with legal obligations
- sexual misconduct, including sexual abuse or exploitation (see LIA International CIO’s Safeguarding and People Protection Policy)
- abuse or exploitation of children, at risk adults or beneficiaries (see LIA International CIO’s Safeguarding and People Protection Policy)
- breach of LIA International CIO’s Anti-bullying and Harassment Policy
- improper conduct or unethical behaviour
- activity which would bring the charity into serious disrepute
- deliberate concealment of information relating to any of the matters listed above

If you have a genuine concern and have a reasonable belief that it is in the public interest to disclose any such malpractice, even if it is later discovered that you were mistaken, this policy ensures that you will not be at risk of losing your job or from suffering any form of retribution as a result.

This assurance will not extend to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to have made false allegations maliciously or without reasonable grounds for believing that the information supplied was accurate will have disciplinary action taken against them under the charity’s disciplinary procedure.

Malpractice is not a complaint about the performance and behaviour of a work colleague towards you. Such complaints should be made through appropriate HR channels. If, however, the complaint relates to sexual misconduct, harassment or other forms of malpractice listed above perpetrated by a work colleague, it may be raised under this policy.

Procedure

If you genuinely believe that the actions of someone has resulted in malpractice, or could lead to malpractice, please follow the procedure below.

1. You should raise the matter with the Safeguarding Co-ordinator, or, if he/she is implicated, the Chair of the Board.

At the point of raising a concern it would be useful if you could share information describing

- whether anyone is at immediate risk of harm
 - what happened. If possible make note of dates, times, places, people
 - who is involved
 - how you know about it
 - when you were first concerned about it
 - whether you have told anybody about it
 - whether any action was taken
2. A decision will be made on whether it is appropriate to handle the complaint under this policy. Where it is believed not to be appropriate, you will be informed and your permission sought to divert the issue, for example to an appropriate HR procedure.
 3. If the matter is reported to the Safeguarding Co-ordinator, LIA International CIO's Procedure for Dealing with Reports of Safeguarding Concerns will be followed.
 4. You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and it may not be possible to give a complete report.

Protection from unfair treatment

LIA International CIO will take no action against an individual, or treat him or her less favourably, for using this procedure. LIA International will take appropriate action, which may result in dismissal, in accordance with the relevant procedure against any member of staff who

- has been found to be victimising an individual for using this procedure
- has been deterring an individual from reporting genuine concerns under this procedure

Reporting your concerns to the Charity Commission

Any member of staff may report serious concerns to the Charity Commission, if the issues concerned have or could seriously harm LIA International CIO's beneficiaries, staff or volunteers, the services we provide or our assets or our reputation. You will again be protected from unfair treatment as a result of doing so. Please note that it is a criminal offence knowingly or recklessly to provide false or misleading information to the Charity Commission.

Communication

This policy will be communicated to all individuals working directly with LIA International CIO and to all partners whom we support. It will also be made available on the charity's website.

Review of policy

After a concern has been raised under this policy, the Safeguarding Co-ordinator should consider whether this policy has been effective in addressing the issues. In any case, this policy will be reviewed annually by the Board for its fitness for purpose and scope.

Adopted: February 2019